

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:

BLACK ELK ENERGY OFFSHORE
OPERATIONS, LLC,

Debtor,

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CASE NO: 15-34287

CHAPTER 11

**MOTION TO VOLUNTARILY WITHDRAW INTERESTED PARTY, TURNKEY
OFFSHORE PROJECT SERVICES, LLC MOTION TO AID IN CONSUMMATION OF
THE CONFIRMED THIRD AMENDED PLAN OF REORGANIZATION [DOC. 2393]**

NOW INTO COURT, through undersigned counsel, comes Interested Party, Turnkey Offshore Project Services, LLC and moves this Court to voluntarily withdraw without prejudice its previously filed Motion to Aid in Consummation of the Confirmed Third Amended Plan of Reorganization Pursuant to 11 U.S.C. §§1141 and 1142 [Doc 2393], which TOPS filed on October 6, 2021. TOPS specifically reserves any and all of its rights in this matter and/or as asserted in that Motion.

Respectfully submitted,

NALLEY AND DEW
A Professional Law Corporation

/s/ George Nalley

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Attorneys for Turnkey Offshore Project Services (TOPS)

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ORDER

Considering the foregoing Motion, it is hereby ordered that the Motion by Interested Party, Turnkey Offshore Project Services, LLC, to Aid in Consummation of the Confirmed Third Amended Plan of Reorganization [Doc 2393] is hereby withdrawn without prejudice to any and all rights of TOPS, which rights are specifically reserved to TOPS. Accordingly, the hearing of this matter, which had been set for November 1, 2021 is hereby canceled.

Houston, Texas this _____ day of October, 2021.

JUDGE ISGUR